

Jackson, Tiffany M (FAA)

From: Reaves, David (FAA)
Sent: Monday, March 28, 2022 3:39 PM
To: 'kellyneubecker@gmail.com'
Cc: Jackson, Tiffany M (FAA)
Subject: Request for Information No. 1 - A and L Aerial - (Docket FAA-2022-0367) - Response Required by April 11, 2022

Follow Up Flag: Follow up
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Ms. Kelly Neubecker, Agent for:
Austen Godbersen
A&L Aerial
867 Hwy 51
Wisner, NE 68791

Dear Ms. Neubecker:

This letter is to inform you that the following information is needed for your petition dated March 10, 2022 on behalf of A&L Aerial - (Docket FAA-2022-0367). This information is necessary for the Federal Aviation Administration (FAA) to process your petition.

- In your petition, section A. Summary, second paragraph - You state: "The multiple aircraft operation proposed in this petition... is similar in nature to that currently conducted by DroneSeed, Exemption No. 17936C,..."
- In your petition, section M. Table labeled: "A&L Aerial seeks exemption from the following interrelated provisions of 14 C.F.R. Parts 61, 91, and 137:" You list § 91.403(b).
- Additionally, in the last paragraph of section I. – You state: "In the DroneSeed Exemption, the FAA determined that the proposed UAS operations required exemption from FAR §§ 91.403(b), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b), and that the achievement of an adequate level of safety required certain conditions and limitations."
- The DroneSeed exemption (17936C) does not grant relief from §91.403(b). The relief from §91.403(b) was first granted in the DroneXum, LLC Exemption (18413A).

Please clarify what exemption you are basing your request for relief from § 91.403(b) upon.

- In your petition, you did not request relief from Condition and Limitation 27(c) (operations closer than 500 ft. from non-participating persons, vessels, vehicles, and structures) as was granted in DroneXum, LLC Exemption (18413A).

Please clarify whether or not you meant to petition for relief from C & L 27(c) based upon the DroneXum, LLC Exemption (18413A).

- In your petition, section M., Table labeled: "A&L Aerial seeks exemption from the following interrelated provisions of 14 C.F.R. Parts 61, 91, and 137:" You list § 91.109.

- In your petition, section M. Subsection II., § 91.109 Flight Instruction; Simulated instrument flight and certain flight tests, you state: “A&L Aerial seeks exemption from this regulation because this regulation requires aircraft used for “flight instruction” to have “fully functioning dual controls.” You then offer an explanation to your rationale for § 91.109(b), (c) and (d), but not for §91.109(a).

Please clarify whether or not you are requesting relief from §91.109(a). If so, please explain your rationale for why an exemption from §91.109(a) should be granted.

What You Need To Do:

If you want the FAA to process your request any further, you must send the information described above by April 11, 2022 before 11:59PM ET. We will consider your petition request open during this period.

Please submit the additional information (non-proprietary) as a comment to your docket at www.regulations.gov, and save the tracking number generated after submission. Proprietary information may be submitted electronically to david.reaves@faa.gov and Tiffany.M.Jackson@faa.gov.

If the FAA Does Not Receive the Requested Information From You:

If the FAA does not receive the requested information from you by the date indicated above, the FAA will take no further action on this petition and close the matter without notifying you further. If you have any questions or require additional time, you may call (717) 712-1035.

Sincerely,




Aviation Safety Inspector
Operations Group | AFS-830

Flight Standards Service
800 Independence Ave, SW
Washington, DC 20591
Phone (717) 712-1035

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